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BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

Docket No. R97-1

Postal Rate And Fee Changes, 1997

INITIAL BRIEF OF AMERICAN LIBRARY ASSOCIATION

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Counsel for American Library Association

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The American Library Association ("ALA") respectfully submits its initial post-hearing brief. For the reasons stated in the brief of the Alliance of Nonprofit Mailers, ALA believes that the Postal Service's failure of proof with respect to its overall revenue requirement warrants rejection of the entire rate request in this docket. If the Commission determines that some rates changes are appropriate, however, ALA requests that the Commission adopt the attributable cost methodology proposed by OCA witness Sheryda C. Collins for library rate mail, for the reasons set forth in her testimony (24 Tr. 13082-13117).

Respectfully submitted,

David M. Levy

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document on all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Dard M. Levy

April 1, 1998